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7 Attorney for Victor Ramone Wright

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 VICTOR RAMONE WRIGHT,
15 Defendant.
16

Case No. 2:21-cr-00024-APG-DJA

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Seventh Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and
19 Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal
20 Public Defender, counsel for Victor Ramone Wright, that the previously ordered deadline for
21 filing of pretrial motions be vacated and that the parties herein shall have to and including
22 November 9, 2022, within which to file the Defendant's pretrial motions previously due
23 September 27, 2022.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including November 23, 2022, to file any and all responsive pleadings,
26 currently due October 11, 2022.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including November 30, 2022, to file any and all replies to dispositive motions,
3 currently due May 2, 2022.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to meet and discuss the
6 government's proposed resolution with her client; and to determine whether to file a pretrial
7 motion should her client reject the government's proposed resolution.

8 2. The defendant is not incarcerated and does not object to the continuance.

9 3. The parties agree to the continuance.

10 4. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed
12 resolution with her client.

13 5. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 This is the seventh stipulation to continue filed herein.

16 DATED this 11th day of October 2022.

17 RENE L. VALLADARES
18 Federal Public Defender

JASON M. FRIERSON
United States Attorney

19 */s/ Nisha Brooks-Whittington*
20 By _____
21 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

/s/ Daniel J. Cowhig
By _____
DANIEL J. COWHIG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 VICTOR RAMONE WRIGHT,

7 Defendant.

Case No. 2:21-cr-00024-APG-DJA

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 FINDINGS OF FACT, CONCLUSIONS OF LAW

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to meet and discuss the
14 government's proposed resolution with her client; and to determine whether to file a pretrial
15 motion should her client reject the government's proposed resolution.

16 2. The defendant is not incarcerated and does not object to the continuance.

17 3. The parties agree to the continuance.

18 4. The additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for defendant sufficient time within which to discuss the proposed
20 resolution with her client.

21 5. Additionally, denial of this request for continuance could result in a miscarriage
22 of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including November 9, 2022, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 23, 2022, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including November 30, 2022, to file any and all replies to dispositive motions.

DATED this 12th day of October 2022.



UNITED STATES DISTRICT JUDGE